



179 WESTBURY AVENUE, CARLE PLACE, NEW YORK 11514 PHONE (516)334-4500 FAX (516)334-4501 WWW.SOKOLOFFSTERN.COM

MARK A. RADI
MRADI@SOKOLOFFSTERN.COM

October 27, 2021

VIA ECF

Hon. Steven I. Locke
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: *Wohnsigl v. Bernhardt,, et al.*
Docket No. 18-CV-1841 (GRB)(SIL)
File No. 210166

Your Honor:

My firm was just retained to represent the defendants in this action. I respectfully request a 30-day adjournment of the November 17, 2021 conference and an extension of all discovery deadlines. The parties are available to appear any day the week of December 13, 2021 at a time convenient for the Court.

As incoming counsel new to this case, I need additional time to review prior counsel's and our clients' files, meet with the defendants and interview witnesses in order to adequately prepare a defense, and review all proceedings and discovery that has been exchanged thus far.

Based on a review of the docket, I also understand there are some discovery issues to be addressed at the next conference. The additional time will allow me to examine the issues, confer with counsel, and determine whether the issues have been resolved. Additionally, I will need time to determine whether plaintiff owes any discovery and to meet and confer and move to compel if appropriate, serve additional discovery demands if necessary and obtain responses, receive and process authorizations for plaintiffs' medical, criminal, and other records that have not yet been produced, issue subpoenas and obtain responsive records if necessary, depose plaintiff and nonparty witnesses, prepare and produce defendants for depositions, consult with potential experts regarding damages, prepare a motion for summary judgment, and explore settlement potential, among other tasks necessary to represent my clients and prepare for trial.

The Court has granted one previous request by plaintiff to adjourn this conference prior to my appearance in this case. Plaintiff has consented to this adjournment.

SOKOLOFF STERN LLP

Hon. Steven I. Locke
October 27, 2021
Page 2 of 2

Thank you for your consideration of this matter.

Very truly yours,

SOKOLOFF STERN LLP



MARK A. RADI

CC:

All counsel via ECF